

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

## Chapter 7

**MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR**

Gordon P. Peyton, Esq., Robert M. Marino, Esq., and the law firm of Redmon Peyton & Braswell, LLP (collectively, “Movant”), pursuant to Local Rule 2090-1(G), respectfully requests leave to withdraw as counsel of record herein for Dallas N. Bishoff (“Client”), the debtor in the above-captioned Chapter 7 case, and in support thereof states as follows:

1. Movant was retained by the Client to prepare and commence the above-captioned case. Movant fulfilled all of its duties with respect to its retention for that purpose. Subsequently, a creditor sought an extension of time to file an objection to discharge in this case. Movant then entered into a separate engagement letter with Client to address matters relating to or affecting the Client's discharge and any other matters arising post-petition.

2. Movant is recently advised that Client wishes to retain new counsel to represent him in this case for any and all matter arising in this case. Client has requested that Movant do no further work for Client and has terminated Movant's engagement in this matter, effective immediately.

3. Based upon the foregoing, Movant now seeks leave to withdraw as counsel of record for Client in this case. Client has signed this pleading to evidence his agreement to Movant's withdrawal.

WHEREFORE, for the foregoing reasons, Movant respectfully requests that the Court enter the attached proposed Order granting Movant leave to withdraw as counsel of record for Dallas N. Bishoff in the above-captioned case, and provide such other and further relief as is just and proper.

Dated: April 21, 2009

Respectfully submitted,

/s/ Robert M. Marino  
Robert M. Marino, Esq. VBN 26076  
REDMON, PEYTON & BRASWELL, LLP  
510 King Street, Suite 301  
Alexandria, Virginia 22314-3143  
Phone: 703-684-2000  
Facsimile: 703-684-5109  
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Seen and Agreed:

/s/ Dallas N. Bishoff  
Dallas N. Bishoff, Debtor

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of April, 2009, I caused a true and correct copy of the foregoing *Motion* to be sent by first-class mail, postage prepaid, to:

Dallas N. Bishoff  
2508 Charleston Lane  
Reston, VA 20191

And served electronically upon all persons requesting notice through the ECF system.

/s/Robert M. Marino  
Robert M. Marino